REMARKS

This Amendment is in response to the Final Office Action mailed 06/02/2006. Applicant has filed a Request for Continued Examination to have the Office withdraw the finality of the Office Action and have this submission entered and considered. In the Office Action, the Examiner rejected claims 1-4 and 7-21 under 35 U.S.C. § 102, and rejected claims 5 and 6 under 35 U.S.C. § 103. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Applicant has cancelled original claims 1-21 and presents new claims 22-42 to more distinctly claim the subject matter of the invention.

Rejection Under 35 U.S.C. § 102

1. The Examiner rejects claims 1-4 and 7-21 under 35 U.S.C. § 102(b) as being anticipated by Thornton et al. (US 6,363,065).

Claim 1, the Examiner asserts that Thornton teaches an apparatus including a programmable CAS module, citing T1AB module 575 shown in Fig. 5, and discussed at column 25, line 5-11, column 27, lines 31-42, and column 28, lines 25-46. Applicant has cancelled claim 1 and presents new claim 22 that includes the element of a table that is used by the claimed CAS module to control the operation of the CAS module as disclosed in the specification as filed on pages 8-9. Applicant respectfully submits that new claim 22 includes elements that clearly distinguish the claimed invention from the teachings of Thornton.

In the rejection of cancelled claim 2, the Examiner asserted that Thornton teaches programmable local call agent finite state machine to interpret events and to output user defined responses because Thornton teaches a Peer Border Element Manager to interpret events E with defined response actions A (Fig. 10, col. 37 lines 31-40). New claim 22 includes elements that provide for the CAS module recognizing changes of line signaling state and sending an indication of an event responsive to the changes. The elements of new claim 22 are clearly distinguished from the teachings of Thornton because they include elements that allow a specific event to be identified based on table entries for a first line signaling state, a second line signaling state, and a first time duration that are not taught by Thornton.

New claim 23 further provides a second time duration entry in the table which further distinguishes the claimed elements from the teachings of Thornton by providing for the recognition of timed pulse signaling.

Claim 2, the Examiner asserts that Thornton teaches an apparatus including a programmable local call agent finite state machine. The element of a programmable local call agent finite state machine does not appear in the new claims.

Claim 3, the Examiner asserts that Thornton teaches an apparatus including a user interface tool. The element of a user interface tool does not appear in the new claims. In the rejection of cancelled claim 1, the Examiner asserted that Thornton teaches a programmable CAS module because Thornton teaches that software update can be provided for a process, such as the T1AB process, in the form of replacement code (col. 25 lines 5-11). New claim 24 includes elements that provides programmability of the CAS module. The element of receiving entries for the table by download from a user is clearly distinguished from programmability by

replacing code. The claimed programmability updates data in the table that controls the operation of the CAS module and this is entirely unlike replacing the code to change the operation of the T1AB process as taught by Thornton.

Claim 4, the Examiner asserts that Thornton teaches an apparatus including a system section, an incoming signals section, an outgoing signals section, and a state events action section. These elements do not appear as such in the new claims. Claims 1 and 2 include elements that are included in a system section, an incoming signals section, and a state events action section as disclosed in the specification as filed on pages 8-9. Applicant respectfully submits that new claims 22 and 23 include elements that clearly distinguish the claimed invention from the teachings of Thornton.

Claim 7, 12, the Examiner asserts that Thornton teaches a method and apparatus as claimed in cancelled claims 7 and 12. New independent claims 28 and 33 include the element of a table that is used to control the recognition of changes of signaling state to generate indications of events as disclosed in the specification as filed on pages 8-9. Applicant respectfully submits that new claims 28 and 33 include elements that clearly distinguish the claimed invention from the teachings of Thornton.

In the rejection of cancelled claims 7 and 12, the Examiner asserted that Thornton teaches programmable local call agent finite state machine to interpret events and to output user defined responses because Thornton teaches a Peer Border Element Manager to interpret events E with defined response actions A (Fig. 10, col. 37 lines 31-40). New claims 28 and 33 include elements that provide for recognizing changes of line signaling state and sending an indication of an event responsive to the changes. The elements of new claims 28 and 33 are clearly distinguished from

the teachings of Thornton because they include elements that allow a specific event to be identified based on table entries for a first line signaling state, a second line signaling state, and a first time duration that are not taught by Thornton.

New claims 29 and 34 further provide a second time duration entry in the table which further distinguishes the claimed elements from the teachings of Thornton by providing for the recognition of timed pulse signaling.

Claim 8, 13, the Examiner asserts that Thornton teaches a method and apparatus in which the telephony protocol is a CAS protocol. This element does not appear in the new claims.

Claim 9, 14, the Examiner asserts that Thornton teaches a method and apparatus wherein the state is a transient condition of the CAS engine. This element does not appear in the new claims.

Claim 10, 15, the Examiner asserts that Thornton teaches a method and apparatus wherein the event is an external trigger received by the CAS engine. This element does not appear in the new claims.

Claim 11, 16, the Examiner asserts that Thornton teaches a method and apparatus wherein the action is a response by the CAS engine to a state-event condition citing State 1045 of the Peer Border Element Manager State Machine of Figure 10. New claims 28-37 include elements the qualify the sending an indication of the event that clearly distinguished the invention from the teachings of Thornton as discussed above in connection with claims 28 and 33.

Claim 17, the Examiner asserts that Thornton teaches a computer readable medium as claimed in cancelled claim 17. New independent claim 38 includes the element of a table that is used to control the recognition of changes of signaling state to generate indications of events as disclosed in the specification as filed on pages 8-9. Applicant respectfully submits that new claim 38 includes elements that clearly distinguish the claimed invention from the teachings of Thornton.

In the rejection of cancelled claim 17, the Examiner asserted that Thornton teaches programmable local call agent finite state machine to interpret events and to output user defined responses because Thornton teaches a Peer Border Element Manager to interpret events E with defined response actions A (Fig. 10, col. 37 lines 31-40). New claim 38 includes elements that provide for the CAS module recognizing changes of line signaling state and sending an indication of an event responsive to the changes. The elements of new claim 38 are clearly distinguished from the teachings of Thornton because they include elements that allow a specific event to be identified based on table entries for a first line signaling state, a second line signaling state, and a first time duration that are not taught by Thornton.

New claim 39 further provides a second time duration entry in the table which further distinguishes the claimed elements from the teachings of Thornton by providing for the recognition of timed pulse signaling.

Claim 18, the Examiner asserts that Thornton teaches a computer readable medium in which the telephony protocol is a CAS protocol. This element does not appear in the new claims.

Claim 19, the Examiner asserts that Thornton teaches a computer readable medium wherein the state is a transient condition of the CAS engine. This element does not appear in the new claims.

Claim 20, the Examiner asserts that Thornton teaches a computer readable medium wherein the event is an external trigger received by the CAS engine. This element does not appear in the new claims.

Claim 21, the Examiner asserts that Thornton teaches a computer readable medium wherein the action is a response by the CAS engine to a state-event condition citing State 1045 of the Peer Border Element Manager State Machine of Figure 10. New claims 38-42 include elements the qualify the sending an indication of the event that clearly distinguished the invention from the teachings of Thornton.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-4 and 7-21 under 35 U.S.C. § 102(b) as being anticipated by Thornton and not apply these rejections to new claims 22-42.

Rejection Under 35 U.S.C. § 103

2. The Examiner rejects claims 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over Thornton in view of Cartwright Jr. (US 6,075,942).

Claim 5, the Examiner asserts that Cartwright teaches a compiler to generate a binary CAS file citing the computer system of Figure 1 as described in the Abstract, lines 1-10. The element of a compiler to generate a binary CAS file does not appear in the new claims. Claim 26

includes the element of a binary file that provides the entries for the table and a parser program to parse the binary file and create the table. Applicant respectfully points out that the use of a parser, as disclosed in the specification on page 10 line 21 to page 11 line 2, clearly distinguishes the claimed binary file from the compiled binary file taught by Cartwright because a compiled file would be executed. Parsing implies that the binary file represents compressed data rather than compiled executable instructions.

Claim 6, the Examiner asserts that Thornton teaches an apparatus including a binary file downloaded to a module. New claim 24 includes the element of the management module is to receive entries for the table by download from a user. Applicant respectfully submits that new claim 24 is clearly distinguished from the teachings Thornton because Thornton does not teach downloading entries for a table of the type claimed.

Applicant respectfully requests that the Examiner withdraw the rejection of claims 5 and 6 under 35 U.S.C. § 103(a) as being unpatentable over Thornton in view of Cartwright Jr.

Conclusion

Applicant reserves all rights with respect to the applicability of the doctrine of equivalents. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Authorization for Extension of Time, All Replies

Authorization is given to treat any concurrent or future reply, requiring a petition for an extension of time under 37 CFR 1.136(a) for its timely submission, as incorporating a petition for extension of time for the appropriate length of time. If any other petition is necessary for consideration of this paper, it is hereby so petitioned. Please charge any shortage in fees in connection with the filing of this paper, including extension of time fees, to Deposit Account 02-2666 and please credit any excess fees to such deposit account.

Respectfully submitted,

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